

DISCLOSURE DIVISION

☒ WAIVER REQUEST

☐ ANSWER

☐ RECONSIDERATION REQUEST

☐ UNTIMELY

DATE: 6/17/2021

DOCKET #: 2021-495

Ashley Wimberley, Director
Disclosure Division

FILER INFORMATION

Name: Mr. Claude T. Bromley, III
Address: 26 Country Club Place, Baton Rouge, LA 70809
Office/Position: GEO Academy Board
of Disclosures/Amendments Filed with Agency: 2
Years Covered: 2018-2019
Final Report: Yes

REPORT INFORMATION

Name of Report: Tier 3 Annual Personal Financial Disclosure covering calendar year 2019
Report ID: PFD21001772
Original Due Date: 7/6/2020
NOD Received: 3/2/2021
NOD Signed by: Virginia Bromley (Wife)
PFD/Answer Due Date based on NOD: 3/11/2021
PFD/Answer Filed: 3/15/2021

LATE FEE INFORMATION

Amount of Late Fee: \$200
Days late from receipt of NOD: 4
Total days late from initial due date: 252
Late Fee Order Received: 5/3/2021
Payment/Waiver Request Due Date: 5/24/2021
Waiver Request Received: 3/10/2021

COMMENTS:

Mr. Bromley stated he notified Kevin Teasley, with GEO Academy School Board of his resignation early 2018. However, when the BOE contacted GEO Academy, the school provided his resignation date effective January 2019. He is unsure about the date discrepancy other than it may have taken time for the school to complete the resignation acceptance paperwork. He ran out of room on my COX email storage and had to delete non-essential emails which included correspondence relating to his service on the board, so he has no proof of when he officially resigned. He did not receive any reminders from the school regarding the annual filing. Mr. Bromley stated he join the board to help the school start-up a local charter school focused on helping black and underprivileged kids get a better education. In addition to spending a great deal of time helping with the start-up, he personally donated \$30,000 plus of his own money to GEO Academy. After serving on the board for several years, GEO was up and running successfully and unfortunately, his time commitments had spread him too thin and he felt it was best to resign. This is Mr. Bromley's first late fee filing.

OTHER LATE FEE INFORMATION

Disclosure Statements:

- Other Outstanding Statements: No
- Other Outstanding Late Fees: No
- Prior Late Fees: No
- Reassessed Late Fees: No

Campaign Finance:

- Outstanding Late Fees: No
- Prior Late Fees: No

To: Tom Bromley
Subject: FW: Request Board of Ethics Waiver. Late Fee Assessment Report PFD21001772

May 4, 2021

To: Louisiana Board of Ethics:

I am writing to respectfully ask the Ethics Board to waive the penalty associated with submitting my Financial Disclosure Form on March 15, 2021 which was one day beyond the seven day period provided per my calculation. Below are the key points supporting my waiver request:

- I recall tendering my resignation from the GEO Charter School Board effective the end of calendar year 2018. Unfortunately, I ran out of room on my COX email storage and had to delete non-essential emails which included correspondence relating to my Board service with GEO Prep Academy so I have no proof of the exact date that I tendered my resignation. I notified Kevin Teasley with GEO of my resignation early in the second half of 2018...he is the founder of GEO and asked me to serve on the Board as a Charter Member several years ago. When Ashley Wimberley with the LA Board of Ethics contacted GEO locally to get confirmation of my resignation, they indicated that my resignation was effective January 2019. I have no clue about the date discrepancy other than it may have taken time for GEO to complete the paperwork. When I tendered my resignation, I agreed to stay on until the end of 2019. There was nothing nefarious involved...just unfortunate timing which was outside of my control.
- I did not receive any reminders or notices from the State to complete the 2019 Financial Disclosure Form until March 2, 2021. On this date, I received a registered letter stating that I had seven business days to provide the disclosure or a fine up to \$1500 would be levied. I found this objectionable since I had not gotten any notices (had no knowledge that I was delinquent) and then the hammer was dropped! I called per the instructions on the demand letter the very next day and let the designated person know that my board resignation was effective the end of 2018 and thus the disclosure was not required. I suggested that an ethics official contact GEO for verification. Ashley indicated that she was not able to get in touch with GEO until March 15, 2021...and that they indicated my resignation was effective January 2019. Since I did not think the disclosure was required...and was waiting for the person I had spoken with to confirm my effective resignation date, it does not seem that the fine should commence before all of the information was available?
- It seemed easier to complete the Disclosure form than to try to contact Kevin Teasley at the Indy GEO Office to get him to confirm that our agreement was that I was resigning at the end of 2018. As a result, I sent in the completed 2019 disclosure form to Ashley Wimberley shortly after 4pm on March 15th (the same day she notified me that GEO said my resignation was effective January 2019).
- I might mention that I have not done any business with the State of Louisiana or any schools or school boards...and have no conflicts of interest. My consulting practice specializes in wholesale distribution services to out of State private businesses.
- Finally, as the saying goes, "no good deed goes unpunished". I joined the GEO Board to help them start-up local Charter schools focused on helping black and underprivileged kids get a better education. In addition to spending a great deal of time helping with the start-up, I personally donated \$30,000+ to GEO Prep. After serving on the Board for several years, GEO was up and running successfully and unfortunately, my time commitments were such that I was spread too thin...and felt it was best to resign from the Board on good terms.
- I welcome you to check, but I do a lot of philanthropic donations in the Greater Baton Rouge Area including major donations to LSU, Pennington, Mary Bird Perkins, Baton Rouge Green and in past years, United Way, etc. I have never been charged with any crimes or misdemeanors and am sending in the appeal to hopefully clear my good name.

With the above in mind, I am respectfully asking that the \$200 late fee be waived. If you have further questions, please call my cell at 225-931-0202 or email at tbrom@cox.net.

Regards,

Claude (Tom) Bromley III
26 Country Club Place
Baton Rouge, LA 70809

tbrom@cox.net

From: tbrom@cox.net
Sent: Monday, March 15, 2021 4:44 PM
To: 'Ashley Wimberley'
Subject: RE: LA Board of Ethics: 2019 Final Annual Disclosure

Ashley:

I am writing to respectfully ask the Ethics Board to waive the penalty associated with submitting my Disclosure on 3/15/21 which is one day beyond the seven day period provided per my calculation. Below are the key points supporting my waiver request:

- I recall tendering my resignation from the GEO Board effective the end of calendar year 2018. Unfortunately, I ran out of room on my COX email storage and had to delete non-essential emails which included correspondence relating to my Board service with GEO Prep Academy so I have no proof to provide. I notified Kevin Teasley of my resignation...he is the founder of GEO and asked me to serve on the Board originally several years ago. When Ashley Wimberley contacted GEO locally to get confirmation of my resignation, they indicated that my resignation was effective January 2019...I have no clue on the discrepancy other than it may have taken time to complete the paperwork. There was nothing nefarious involved...just timing.
- I did not receive any reminders to complete the disclosure and then on 3/2/21, I received a registered letter stating that I had seven business days to provide the disclosure or a fine up to \$1500 would be levied. I found this objectionable since I had not gotten any notices and then the hammer was dropped! I called per the instructions the next day and let the designated person know that my recall was that my resignation was effective the end of 2018 and thus the disclosure was not required. I suggested that the official contact GEO for verification. Ashley indicated that she was not able to get in touch with GEO until 3/15/21 and that they indicated my resignation was effective January 2019. Since I did not think the disclosure was required...and was waiting for the person I had spoken with to confirm, it does not seem that the fine should commence before all of the information was available?
- It seemed easier to complete the Disclosure form than to try to contact Kevin Teasley at the Indy GEO Office to get him to confirm that our agreement was that I was resigning at the end of 2018. As a result, I sent in my disclosure to Ashley Wimberley shortly after 4pm today, March 15th.
- Finally, as the saying goes, "no good deed goes unpunished". I joined the GEO Board to help them start up local Charter schools to help black and underprivileged kids get a better education. In addition to spending a great deal of time helping with the start-up, I personally donated \$25-30,000 to GEO Prep. After serving on the Board for several years, GEO was up and running successfully and unfortunately, my time commitments were such that I was spread too thin and felt it was best to resign from the Board on good terms.

With the above in mind, I am respectfully asking that any penalties be waived associated with the financial disclosure statement.

Thanks for your consideration.

Best,

Tom

Claude T. Bromley
26 Country Club Place
Baton Rouge, LA 70809

tbrom@cox.net

From: Ashley Wimberley <Ashley.Wimberley@la.gov>
Sent: Monday, March 15, 2021 5:14 PM
To: tbrom@cox.net
Subject: RE: LA Board of Ethics: 2019 Final Annual Disclosure

Good morning Mr. Bromley,

I have received your final Tier 3 Personal Financial Disclosure covering calendar year 2019. Your disclosure has been reviewed and deemed compliant.

I have also have received your Waiver Request and will processed it for the next step of docketing. Once your waiver Request is docketed (issued a case number and assigned a staff attorney), you'll received a notice in the mail with that docket number and meeting date for when the Ethics Board will review your request and render a decision. Instructions will be provided in that letter, if you wish to attend the board meeting to speak on your behalf (attendance is optional).

Please keep in mind the that Ethics Administrations staff/employees do not have the authority to render a decision regarding your late fee assessments. Please let me know if you have any questions or need any additional information.

Thank you and have a great day!

Ashley Wimberley
Personal Financial Disclosure Director
Ethics Administration
P. O. Box 4368
Baton Rouge, LA 70821
(225) 219-5600 - Office
(800) 842-6630 - Toll Free
(225) 381-7271 - Fax
www.ethics.la.gov

Ashley Wimberley
(225) 219-5600

From: tbrom@cox.net <tbrom@cox.net>
Sent: Monday, March 15, 2021 4:23 PM
To: Ashley Wimberley <Ashley.Wimberley@la.gov>
Subject: RE: LA Board of Ethics: 2019 Final Annual Disclosure

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ashley:

Attached please find a PDF with my completed Tier 3 Personal Financial Disclosure for 2019. Let me know if you have any questions.

tbrom@cox.net

From: tbrom@cox.net
Sent: Monday, March 15, 2021 4:23 PM
To: 'Ashley Wimberley'
Subject: RE: LA Board of Ethics: 2019 Final Annual Disclosure
Attachments: Tier3PersonalFinancialDisclosureStatement2019.pdf

Ashley:

Attached please find a PDF with my completed Tier 3 Personal Financial Disclosure for 2019. Let me know if you have any questions.

Thanks!

Tom

From: Ashley Wimberley <Ashley.Wimberley@la.gov>
Sent: Monday, March 15, 2021 3:51 PM
To: tbrom@cox.net
Subject: LA Board of Ethics: 2019 Final Annual Disclosure

Good afternoon Mr. Bromley,

It was a pleasure speaking with you this afternoon.

Per our conversation, I have attached a blank copy of the 2019 Tier 3 Annual Personal Financial Disclosure, to complete for the Final Year you served as a Board Member for the GEO Academy Charter School. This disclosure was initial due May 15, 2020, but was extended to June 8, 2020 by a proclamation made by the Governor. Please complete the attached disclosure and submit back to me as a pdf attachment only. *Please note I cannot accept pictures/editable versions of your disclosure.*

Also, as stated during our phone conversation, you will be assessed a late fee penalty for filing the report outside of the seven business day window from when you received the notice on March 2, 2021. You will have the opportunity to submit a written letter to the Ethics Board Members explaining why the late fee should be waived, reduced, or suspended.

Please let me know if you have any questions or need any additional information.

Thank you and have a great day!

Ashley Wimberley
Personal Financial Disclosure Director
Ethics Administration
P. O. Box 4368
Baton Rouge, LA 70821
(225) 219-5600 - Office
(800) 842-6630 - Toll Free
(225) 381-7271 - Fax

*Yes, I received on 3/2/21
but I called to explain
the discrepancy and asked
for verification. I should
have been given more
time as it took days
for the Ethics Admin to
respond.*

C. Tom Bromley
26 Country Club Place
Baton Rouge, Louisiana 70809

LA Board of Ethics
P.O. Box 4368
Baton Rouge, LA 70821

